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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION,

Master File No. 3:07-cv-05944-SC

MDL No. 1917

This Documents Relates To:

ALL ACTIONS

**REPLY DECLARATION OF PAMELA
PHAM IN SUPPORT OF THE STATE OF
CALIFORNIA'S MOTION FOR
PERMISSIVE INTERVENTION AND
MOTION TO RESTORE PUBLIC
ACCESS TO 107 COURT RECORDS**

Hearing Date: September 25, 2015

Time: 10:00 A.M.

Courtroom: One, 17th Floor

Judge: Honorable Samuel Conti

1 I, PAMELA PHAM, declare as follows:

2 1. I am a Deputy Attorney General with the California Attorney General's Office and
3 a member of the State Bar of California. I am also admitted to this Court. I make this declaration
4 in support of the State of California's Reply Brief in Support of Motion For Permissive
5 Intervention and Intervenor's Motion To Restore Public Access To 107 Court Records.

6 2. The information contained herein is based on my own personal knowledge and if
7 called as a witness I could, and would, testify competently that the matters set forth herein are
8 true and accurate to the best of my recollection.

9 3. Attached hereto as Exhibit A is the Declaration of Tyler M. Cunningham in
10 Support of Application to Seal Documents, which was filed in the Superior Court of San
11 Francisco, Case No. CGC-11-517786. In paragraph 7 of this Declaration, Mr. Cunningham states
12 that "U.S. District Court Judge Samuel Conti has, on multiple occasions, ordered that the SDI
13 Interrogatory Responses be sealed." Mr. Cunningham also cites the following sealing orders of
14 this Court: MDL Dkt. No. 1120, MDL Dkt. No. 1512, and MDL Dkt. No. 1698.

15 4. Of the 107 court records that are the subject of the State's Motion for Permissive
16 Intervention and Motion to Restore Public Access, 69 records were attached to dispositive
17 motions.

18 I declare under penalty of perjury under the laws of the United States and of the State of
19 California that the foregoing is true and correct and that this declaration was executed on
20 September 2, 2015 in San Francisco, California.

21 By: /s/ Pamela Pham
22 PAMELA PHAM